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Attorneys for Plaintiffs
SCHAECHTER ACQUISITIONS, INC.
AND PHILIP SCHAECHTER

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SCHAECHTER ACQUISITIONS, INC., a
Nevada corporation, and PHILIP
SCHAECHTER, an individual,

Plaintiffs,

v.

GEORGE HEIN, Individually and
Doing Business As "PROTEACHER",
and PROTEACHER,

Defendants.

Case No. 10-cv-4372 CRB

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING CASE MANAGEMENT
CONFERENCE**

This Mutual Stipulation is hereby entered into between Plaintiffs Schaechter Acquisitions, Inc. and Philip Schaechter and Defendants George Hein and ProTeacher (collectively, the "Parties") by their respective counsel pursuant to Local Rule 7-12. Counsel for Defendants hereby appears special, and without waiver of any rights to object to the Complaint, for purposes of this Stipulation only.

RECITALS

A. On October 15, 2010, the Parties entered into a written Tolling Agreement in order to facilitate ongoing settlement negotiations between them in order to resolve this matter.

1 B. The tolled period of the Tolling Agreement expires on January 13, 2011.

2 C. The Tolling Agreement states that Defendants George Hein and ProTeacher will
3 accept service of process of the Complaint through counsel at the end of the tolled period;

4 D. Accordingly, the Parties hereby agree as follows:

5 **STIPULATION**

6 1. The Parties respectfully request the court continue the Case Management
7 Conference currently set for January 14, 2011 until March 18, 2011 in order to allow them time
8 finalize, if possible, their settlement discussions, to serve the Complaint, to respond to the
9 Complaint, and to meet and confer on all topics related to the Case Management Conference.

10
11 IT IS SO STIPULATED.

12 Dated: January 4, 2011

COMPUTERLAW GROUP LLP

13
14 By: /s/ Jack Russo
Jack Russo
Christopher Sargent

15
16 Attorney for Plaintiffs
SCHAECHTER ACQUISITIONS, INC. AND
17 PHILIP SCHAECHTER

18 Dated: January 4, 2011

TURNER BOYD LLP

19
20 By: /s/ Julie Turner
Julie Turner

21 Appearing Specially on Behalf of
22 GEORGE HEIN

23
24 I attest under penalty of perjury that concurrence in the filing of this document has been
25 obtained from Julie Turner.

26 /s/ Jack Russo
Jack Russo

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:

2
3 Dated: January 06, 2011

